



**PARTNERSHIP
FOR AMERICA'S
CHILDREN**

State and local child advocates working
together for a better future

**Public Comment of Deborah Stein, J.D., Network Director of the Partnership for America's Children to
the Census Scientific Advisory Committee Meeting, March 17-18 2022**

Submitted by email to shana.j.banks@census.gov

My name is Deborah Stein, and I am the Network Director of the Partnership for America's Children. The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has over 50 member organizations in 40 states that advocate to improve policies for children at the state, local and federal level. Collectively they represent over 90% of the nation's children. Partnership members use Census data in their advocacy, and thirty Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on children for policy makers, administrators, and nonprofits.

The Partnership for America's Children served as the national hub on the undercount of young children in the 2020 Decennial Census. In this role the Partnership formed and continues to co-lead a national working group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

I write today to submit the Partnership's comments for the CSAC March 2022 meeting. Our comments focus on the recent release of the Demographic Analysis data showing that the 2020 census had a significantly worse undercount of young children than the 2010 census.

The Partnership for America's Children is deeply concerned by the number of young children missed in the 2020 census as shown in the Demographic Analysis data that the Bureau released on March 10. This is the most young children missed since 1970, and unless the Bureau takes steps to adjust the Population Estimates Series, it will result in significant misallocation of federal funds for children's programs. The undercounts of Hispanics and Blacks were also disturbingly high.

We are pleased the Bureau is considering research on how to adjust the Population Estimate series. That research should look at the impact of any adjustments on the undercounts of young children, Blacks, Hispanics, and other undercounted racial groups. The Bureau should share that research with stakeholders so that we can provide meaningful input. When the Bureau develops this adjustment, we ask it to avoid using the concept of "net undercount" which inherently minimizes the undercount of some populations and increases the overcount of other populations.

Once the Bureau has identified an adjustment approach that corrects the Population Estimates Series for all these groups, it should use that approach for the full decade.

We recognize that Bureau staff faced a wide range of challenges, including restrictions on funding, the pandemic, hurricanes, fires, and an artificially rushed closing to the NRFU period. We applaud the efforts they made to conduct a fair and accurate census in the face of these challenges. Nevertheless, the Bureau must take steps to try to understand what led to the likely significant undercount, to share data that will allow stakeholders to understand these factors, to ameliorate the effects of the likely undercount on funding for children's programs, and to learn from these factors how to improve the 2030 Census and other demographic products.

Thank You for Your Decisions on Improving the Count of Young Children

Before I address the 2020 undercount, I want to commend several decisions of the Bureau.

First, we are delighted by the Bureau's decision, announced at the September 2021 CSAC meeting, to create a cross-directorate team working to improve the count of young children across all Census Bureau demographic work. We believe that this is an important step forward in improving the count of young children and babies, which could in turn improve the allocation of federal funds to the children and families who need them most. Improving the count of young children will also, ensure the appropriate political representation of communities with large numbers of young children, and give state and local policy makers better data to implement a wide range of policies and programs affecting children. We urge the cross-directorate team to identify establish a liaison with the children's community so that we can provide information and insight that might support its work.

The Census Bureau also recently announced the creation of the Office of Strategic Alliances to maintain many of the relationships developed in the preparation for the 2020 Census, including the link to partnerships with child advocates. This is a very positive step.

We applaud the Bureau's response to this NAC recommendation from the spring 2021 meeting:

RECOMMENDATION: The NAC recommends that the Bureau develop operational measures that go beyond household response rates. Operational success measures should capture the completeness of the household response including the actual number of individuals living in the household.

Census Bureau Response: The Census Bureau accepts the recommendation to consider this as we plan for the 2030 Census.

Increased Urgency for A Strong, Active Cross Directorate Team on Improving the Count of Young Children

Last week's news that the 2020 Census missed even more young children than the 2010 makes it clear that the Cross-Directorate Team working to improve the count of young children across all Census demographic products must take a strong role in identifying and pursuing new approaches to the count. The Cross Directorate Team must lead, and not merely share information (important though sharing is). That means it must assess current approaches, including the new strategies tried in 2020, and must originate new strategies. We believe that this is an important step forward in improving the count of young children which could in turn improve the allocation of federal funds to the children who need them most, ensure the appropriate political representation of communities with large numbers of young children, and give state and local policy makers better data to implement a wide range of policies and

programs affecting children. We urge the cross-directorate team to identify a liaison with the children's community so that we can provide information and insight that might support its work.

Recommendation of Steps to Take to Allocate Funding for Children and Communities using Accurate Data

We urge the Bureau to conduct research on how to adjust the Population Estimate series so that it is corrected for the undercounts of young children, Blacks, and Hispanics, and to share that research with stakeholders so that we can provide meaningful input.

The Demographic Analysis data released by the Bureau on March 10 shows that the 2020 Census had a larger undercount of young children (ages 0-4) than every other census since 1970. Because the Population Estimates Series based on decennial census data is used to allocate some federal funds, and because the ACS estimates are controlled to match the Census Bureau's annual population estimates, by age, sex, race, and Hispanic origin, and the ACS is also used to allocate many federal funds, this undercount means that federal funds will be misallocated, and the children who are most in need of them will get less than their fair share, unless the Bureau adjusts the Population Estimates Series to ameliorate this undercount

Areas for research and data disclosure

We think the Bureau should conduct evaluations of "within household omissions" and release data so that outside stakeholders can also conduct their own analyses. We do not think this kind of data would violate Title 13 because it would not identify any individual or their characteristics. Rather it would identify the processes. We suggest the following approaches:

- Reviewing substate data and releasing it for stakeholder review might help identify areas where the count was more thorough to areas where it was less thorough, and then help identify what the process differences were between them. For example, state or substate comparisons of births, deaths, and immigration data on young children at a state or sub state level could be compared to the 2020 census results for those areas.
- Reviewing nonresponse rates to questions within the questionnaire, and looking for variations by geography, and also comparing self response rates to NRFU, administrative data and proxy data. When people just respond how many people live at an address and don't offer data on race, ethnicity or age, we lose data on young children, Blacks, and Hispanics. We know generally that self response data is the highest quality data but it would be very valuable to measure how each of the other forms of data compare to self response rates on these questions.
- Evaluating the quality of administrative data. We continue to have grave concerns about the completeness of administrative data in at least three respects and to urge that it be used as a supplement to more direct methods of counting people, not a replacement. Where tax records are used, the Bureau should explicitly look for and use other administrative records that capture the second (or third, or fourth) household at the same address. We note that nearly 5% of all households were counted using administrative data (<https://www2.census.gov/about/partners/cac/nac/meetings/2021-05/presentation-2020-census-data-quality.pdf>) so the concerns we list here could contribute to a significant portion of the undercount of young children.

- The Bureau has acknowledged that their administrative data sources include no information on children born in the first three months of the decennial census year, because those children would not be included in their parents' tax returns for the year before.
- Tax returns do not include data on race or ethnicity.
- Tax returns are provided by a different household unit than the census is measuring. Tax returns only include the taxpayer, their spouse, and their dependents. But many residences include at one address two or more household units for census purposes. A single address on the MAF might house the homeowner or renter and the people on their tax return, older family members such as parents who have too little taxable income to file a tax return, young parents and their children who cannot afford their own home and make too little to file a tax return, nonmarital partners and their children who do not belong on the primary tax payers return and do not file their own return. The tax definition of a dependent that would show up on someone's return also has a relationship test, an immigration status test, and a requirement that they lived in the household more than six months in the tax year. All of these criteria mean people living in the household who should be counted in the census will not appear on the tax form. These "doubled up" households will simply not be counted if the Bureau relies on administrative data instead of direct contact or after only minimal efforts to make direct contact.

Census steps to ameliorate the consequences of an undercount

The consequences of this undercount of particular demographic groups could be severe. One of the impacts would be the consequences for allocating federal funding. The Bureau has announced that it is considering an alternative approach to developing its yearly Population Estimates (or Vintage 2021 Estimates) called the blended base. This new approach would rely on detailed demographic data and start from the 2010 Census as the base. The Bureau has said that since it would use birth records, it thinks this approach would improve the count of young children and thereby ameliorate the impact of the undercount on funding. After the release of the demographic analysis data last week, Bureau staff said more generally that they were looking at using administrative data to help improve the 2020 results. We are uncertain whether that is a reference specifically to the publicly discussed blended base, other strategies (perhaps for the ACS), or both. We ask the Bureau to provide more specific information on the strategies that it is considering.

We note that if the Blended Base, or any approach to adjusting funding, makes the undercount of all Black and Hispanic people more severe, it will reduce funding for young Black and Hispanic children for many programs even if it corrects the count of young children. That is because our country's residential areas are still heavily concentrated by race, and if Black and Hispanic communities are underfunded do a funding adjustment that makes the count of Blacks and Hispanics worse, the children in those communities will suffer. <https://www.urban.org/racial-equity-analytics-lab/structural-racism-explainer-collection/causes-and-consequences-separate-and-unequal-neighborhoods>

We ask the Bureau to release more information about its plans for correcting the 2020 census data that is used for allocating federal funding using administrative data whether it be through the blended base or another approach. Specifically, we ask for information on

- the process of the development of the blended base (who is involved, whether the development includes an assessment of its impact on data on young children and racial and ethnic groups),
- a detailed description of how the blended base is constructed
- a comparison of the blended base for 2022 estimates calculated using the 2020 census, so that we can understand whether the blended base would provide a more accurate source of estimates than the decennial census data, specifically looking at the numbers for young children, Blacks and Hispanics
- the ways in which the Population Estimate Program, and therefore a blended base, affects the allocation of federal funding, including how it may shape the ACS and other data sources that some agencies are using,
- the role of the Bureau in providing data to federal agencies that allocate federal funds, including whether they provide an analysis of the different options with respect to age, race and ethnicity, and
- disclosure of other ways that the Population Estimates are used to shape law, policy and practice, to the extent known by the Bureau, that may affect young children. For example, we believe this data is what school demographers use to draw district and school boundaries.

While we understand that the Bureau does not make the decisions about which data to use in allocating funding, it does prepare the data, including this alternative blended base approach, and advise the agencies on what the different options are. The Bureau should include assessment of the impact on young children, Blacks, Hispanics, young Black children, and young Hispanic children, as it develops the blended base and explains it to agencies.

We also understand that many agencies have used the ACS for allocating funding. Therefore, we ask the Bureau to disclose what alternatives it is suggesting to agencies given that the pandemic and related challenges made it impossible to produce 2020 ACS data. We are concerned that if agencies use older data, or data that averages across several years, the funding allocations might not go to the places with the most need or most in line with Congressional intent, because there was so much residential disruption during the pandemic. If the Bureau disclosed what data options are available to the agencies, and broke out the data option consequences by age, race and ethnicity, stakeholders could better understand the implications for their constituents and possibly make suggestions to improve funding allocation given these challenges.

We urge the Bureau to consult with the child advocacy and child services community as it considers which administrative data to use. Child advocates and child serving agencies use and rely on state and federal administrative data and have insights into the accuracy and limitations of this data that might be useful. The Partnership offers to help coordinate consultations with these experts.

Finally, we urge the Bureau once it has developed an adjustment to the decennial data that improves the accuracy of the count, with specific regard to young children, Blacks and Hispanics, to use that approach throughout the decade. There can be no reason to use less accurate data in future years when more accurate data can be obtained.

Preparation for the 2030 Census

While 2030 may seem far away, we know that it takes a full decade to prepare properly for the decennial census. We ask the Bureau to share its planning process, any tests it is considering, and how it

is going to incorporate the lessons learned from its research and evaluations of the 2020 census with respect to the count of young children in its planning process. We also ask it to offer regular opportunities for stakeholders to provide input during the planning process.

Thank you for considering our recommendations, and for giving us this opportunity to comment.

Deborah Stein

Network Director